

**APPENDIX B**  
**Financial Data Submitted by the Settling**  
**Defendant to the United States**

## **Financial Data Submitted by the Settling Defendant to the United States**

Individual Ability to Pay Claim/Financial Data Request Form as submitted by Settling Defendant through Herbert B. Bennett dated October 1, 1998 - Includes Last Will and Testament of Clifford G. Higgins.

Letter from Herbert B. Bennett dated December 2, 2003 to Myles Flint regarding Lisbeth Higgins' Ability to Pay Settlement Proposal.

Letter from Herbert B. Bennett dated July 30, 2004 to Myles Flint regarding Lisbeth Higgins Ability-to-Pay Settlement Proposal. Letter includes counter-proposal to government settlement offer.

Updated Certification of Lisbeth Higgins concerning Ability to Pay settlement as submitted by Settling Defendant through Herbert B. Bennett dated August 27, 2004.

Letter dated October 21, 2004 from Herbert B. Bennett to Patricia McKenna of U.S. DOJ regarding Lisbeth Higgins Ability-to-Pay Settlement Proposal and explanation of entries on firm records of payments and invoices.

Letter dated November 3, 2004 from Herbert B. Bennett to Patricia McKenna regarding Lisbeth Higgins Ability-to Pay Settlement Proposal and information regarding Hasty Acres.

Letter dated January 4, 2005 from Herbert B. Bennett to Patricia McKenna regarding Lisbeth Higgins Ability-to-Pay Settlement Proposal enclosing law firm invoices.

Updated Certification of Lisbeth Higgins Individual Ability to Pay Claim - submitted by Herbert B. Bennett via cover letter dated September 20, 2006 - Enclosed Summary sheet showing current principal and interest for trust accounts holding insurance proceeds on Mrs. Higgins' behalf.

Letter dated October 11, 2006 from Herbert B. Bennett to Deborah Schwenk - Enclosing bank statements and summary sheet showing principal and interest status for trust accounts holding the insurance proceeds on Mrs. Higgins' behalf.

Letter dated November 13, 006 from Herbert B. Bennett to Deborah Schwenk - Enclosing bank statements and summary sheet showing current principal and interest status for the trust accounts holding the insurance proceeds on Mrs. Higgins' behalf.

Copies of the following insurance policies submitted by Settling Defendant:

1. Umbrella Liability Policy issued by Hartford Accident and Indemnity Company to Higgins Refuse & Disposal Service Inc. and Hasty Acres Riding Club Inc. From 7/31/75 To 4/20/76.

2. Umbrella Liability Policy issued by Hartford Accident and Indemnity Company to Higgins Refuse & Disposal Service Inc.  
From 4/20/76 To 5/9/77.
3. Casualty Insurance Policy issued by The Hartford to Clifford G Higgins T/A Higgins Refuse & Disposal Service  
From 2/4/77 To 2/4/78.
4. Umbrella Liability Policy issued by The Hartford to Higgins Refuse & Disposal Service Inc.  
From 4/20/77 To 4/20/78.
5. Umbrella Liability Policy issued by The Hartford to Higgins Refuse & Disposal Service Inc.  
From 4/20/78 To 4/20/79.
6. General-Automobile Liability Policy issued by Pennsylvania National to Higgins Disposal Service, Inc., Issuing Date 3/16/82.
7. General-Automobile Liability Policy issued by Pennsylvania National to Higgins Disposal Service, Inc., Issuing Date 2/1/83.
8. General-Automobile Liability Policy issued by Pennsylvania National to Higgins Disposal Service, Inc., Issuing Date 3/1/85.
9. Casualty Insurance Policy issued by The Hartford to Clifford G Higgins T/A Higgins Refuse & Disposal Service.  
From 2/4/81 To 2/4/82.

Copies of the following Tax Returns submitted by the Settling Defendant:

7. **1999** - U.S. Corporation Income Tax Return - Form 1120 - Hasty Acres Riding Club, Inc.
8. **2000** - U.S. Corporation Income Tax Return - Form 1120 - Hasty Acres Riding Club, Inc.
9. **2001** - U.S. Corporation Income Tax Return - Form 1120 - Hasty Acres Riding Club, Inc.
10. **1998**- U.S. Individual Income Tax Return - Form 1040 - Matthew and Linda Kulley.
11. **1999** - U.S. Individual Income Tax Return - Form 1040 - Matthew and Linda Kulley.
12. **2000** - U.S. Individual Income Tax Return - Form 1040 - Matthew and Linda Kulley.
13. **1999** - U.S. Individual Income Tax Return - Form 1040 - Clifford Jr.and Julie Higgins.

14. **2000** - U.S. Individual Income Tax Return - Form 1040 - Clifford Jr. and Julie Higgins.
15. **2001** - U.S. Individual Income Tax Return - Form 1040 - Clifford Jr. and Julie Higgins.
16. **1998** - U.S. Individual Income Tax Return - Form 1040 - John and Dianne Parisi.
17. **1999** - U.S. Individual Income Tax Return - Form 1040 - John and Dianne Parisi.
18. **2000** - U.S. Individual Income Tax Return - Form 1040 - John and Dianne Parisi.
19. **1993** - U.S. Individual Income Tax Return - Form 1040- Clifford and Lisbeth Higgins.
20. **1994** - U.S. Individual Income Tax Return - Form 1040 - Clifford and Lisbeth Higgins.
21. **1995** - U.S. Individual Income Tax Return - Form 1040 - Clifford and Lisbeth Higgins.
22. **1996** - U.S. Individual Income Tax Return - Form 1040 - Clifford and Lisbeth Higgins.
23. **1997** - U.S. Individual Income Tax Return - Form 1040 - Clifford and Lisbeth Higgins.
24. **1998** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.
25. **1999** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.
26. **2000** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.
27. **2001** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.
28. **2002** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.
29. **2002** - Form 1099-MISC-Income - Payer's Name - Pennsylvania National Mutual Casualty Insurance Company - Recipient's Name - Bennett & Yoskin.
30. **2003** - U.S. Individual Income Tax Return - Form 1040 - Lisbeth B. Higgins.

### **Financial Statements**

1. Compiled FleetOne Premier Financial Statements:  
Premier Money Market Account - Account Number 9461814243- Lisbeth Higgins Escrow; Bennett & Yoskin Agent for years 2002 through 2004.
2. Compiled Sovereign Bank Financial Statements: for Money Market Accounts # 732053706, 732053714, 732053722 - for years 2002 through 2004.
3. The Bank of New York -Master Escrow Statement - Account Number 617-4326531  
Title: Sokol Behot & Fiorenzo in Escrow for Lisbeth Higgins - Period 08/01/06 to

08/31/06.